

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TERRANCE MONTAGUE,

PLAINTIFF

CIVIL NO. 1:CV-00-0895

V.

(MAGISTRATE JUDGE SMYSER)

ROBERT W. MEYERS, ET AL

DEFENDANTS

FILED
HARRISBURG

NOV 07 2001

AFFIDAVIT IN SUPPORT OF THE PLAINTIFF'S
MOTION FOR THE APPOINTMENT OF COUNSEL

MARY E. D'ANDREA, CLERK

Per 9/15
I MAKE DEPUTY CLERK

1. I AM THE PLAINTIFF IN THE ABOVE ENTITLED CASE. I MAKE DEPUTY CLERK
AFFIDAVIT IN SUPPORT OF MY MOTION FOR THE APPOINTMENT OF COUNSEL.

2. THIS IS A COMPLEX CASE BECAUSE IT CONTAINS DIFFERENT LEGAL
CLAIMS, AND ACTIONS, WITH EACH CLAIM INVOLVING A DIFFERENT SET OF
DEFENDANTS.

3. THE CASE INVOLVES MEDICAL ISSUES THAT MAY REQUIRE EXPERT
TESTIMONY.

4. THE PLAINTIFF AND/OR THE DEFENDANTS HAVE DEMANDED A JURY
TRIAL.

5. THE CASE WILL REQUIRE THE LOCATING OF WITNESSES.

6. THE PLAINTIFF HAS ONLY A HIGH SCHOOL DIPLOMA AND NO LEGAL
EDUCATION.

7. THE PLAINTIFF IS SERVING A SENTENCE UNDER PUNITIVE
CELL-RESTRICTION, FOR THIS REASON HE HAS VERY LIMITED ACCESS TO LEGAL
MATERIALS AND HAS NO ABILITY TO LOCATE HIS WITNESSES IN THIS ACTION.

WHEREFORE, THE PLAINTIFFS MOTION FOR THE APPOINTMENT OF COUNSEL
SHOULD BE GRANTED.

I VERIFY THAT THE STATEMENTS MADE IN THIS AFFIDAVIT ARE TRUE
AND CORRECT. I UNDERSTAND THAT FALSE STATEMENTS HEREIN ARE MADE
SUBJECT TO THE PENALTIES OF PERJURY.

DATED: 11-3-01

Terrance Montague
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